

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STEPHANIE JONES,

Plaintiffs

v.

FOX ROTHSCHILD LLP and IAN W.  
SIMINOFF,

Defendants.

Case No. 2:20-cv-06312-SDW-LDW

**JOINT DISCOVERY PLAN**

**RULE 26(F) CONFERENCE**

The only remaining Count of the Complaint is Count I, which asserts a claim against Defendant Fox Rothschild LLP (“Fox Rothschild”) under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e et seq. (“Title VII”). All other Counts of the Complaint have been dismissed against Fox Rothschild and all claims against Defendant Ian Siminoff (“Siminoff”) have been dismissed with prejudice, so that Fox Rothschild is the only remaining Defendant. No formal order was entered dismissing Siminoff as a party.

On February 18, 2022, Plaintiff was ordered to file an Amended Complaint limited to Plaintiff’s Title VII claims of gender discrimination and retaliation against Fox Rothschild by March 1, 2022 (ECF No. 80). On February 19, 2022, Plaintiff requested that the Court stay the proceedings and allow Plaintiff to file an interlocutory appeal of the dismissal of the remaining claims. On March 17, 2022, the Court granted Plaintiff leave to file a motion for partial entry of judgment under Fed. R. Civ. P. 54(b) to permit appeal of some of the Court’s rulings (ECF No. 85). To date, Plaintiff has not filed a motion. The parties request that a schedule for filing of the motion and briefing be discussed at the conference.

- (a) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made.**

Rule 26(a) disclosures should be required only following resolution of Plaintiff’s anticipated motion.

- (b) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues.**

Discovery should be stayed until decision on Plaintiff’s Rule 54(b) motion. Only at that time will it be known (1) whether any previously dismissed claims will be restored, and (2)

whether Siminoff will as a consequence be restored as a party. The scope of discovery will consequently remain unresolved until that time.

- (c) **Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.**

The parties agree to preserve all evidence in this case.

- (d) **Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502.**

The parties will enter into a Confidentiality Agreement and Protective Order to protect the confidential nature of certain discovery materials.

- (e) **The date by which discovery should be completed and proposed deadline for joining other parties and amending the pleadings;**

These dates should be set following resolution of Plaintiff's Rule 54(b) motion.

/s/Tyrone Anthony Blackburn

Tyrone Anthony Blackburn, Esq.\*  
T. A. Blackburn Law, PLLC  
1242 East 80th Street  
3rd Floor  
Brooklyn, NY 11236  
*Attorneys for Plaintiff*

/s/Rosemary S. Gousman

Rosemary S. Gousman, Esq.  
Fisher & Phillips LLP  
430 Mountain Avenue., Suite 303  
Murray Hill, NJ 07974  
*Attorneys for Defendant*  
Fox Rothschild

/s/Meredith Cavallaro

Meredith Cavallaro, Esq.\*  
Paduano & Weintraub LLP  
1251 Avenue of the Americas  
Suite 920  
New York, NY 10020  
*Attorneys for Dismissed Defendant*  
Ian Siminoff

\*Electronic signatures have been added with permission.